

KURTIS & ASSOCIATES, P.C.

ORIGINAL

SUITE 600
2000 M STREET, N.W.
WASHINGTON, D.C. 20036

RECEIVED

APR 13 2001

(202) 328-4500
TELECOPIER (202) 328-1231

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Report to the Federal Communications Commission on Carrier Efforts Toward Attaining Digital TTY Accessibility, and the Status of the Various Technological Solutions, as Provided by CC Docket No. 94-102, In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems

RSA 1 Limited Partnership d/b/a Cellular 29 Plus ("Cellular 29"), by its attorneys, pursuant to the Federal Communications Commission's ("Commission") *Fourth Report and Order* in CC Docket No. 94-102,¹ hereby files a Quarterly Report for the quarter ending March 31, 2001, detailing its efforts towards attaining digital TTY accessibility, and the status of the various technological solutions that will help it attain that goal.

In the *Fourth Report and Order* the Commission established December 31, 2001 as the new deadline for carriers operating digital wireless systems to have obtained all software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices. It further established June 30, 2002 as the deadline for carriers to integrate, test and deploy the technology in their systems in conjunction with the public safety community. In order to be assured that the aforementioned deadlines will be met without complication, the Commission required digital wireless carriers to submit Quarterly Reports fifteen days after the end of each quarter.² Cellular 29 now files this instant report with the Commission.

I. Carrier Background

Cellular 29 provides analog CMRS wireless service in the Iowa 1 - Mills RSA.³ Cellular 29 currently does not offer digital service in the above-referenced markets. As such, Cellular 29 has the ability to route, and will route calls to a TRS provider via the 911 dialing code over its analog network. Cellular 29, however, intends to upgrade its network to provide digital wireless service in the near future, and as such is exploring issues related to providing TTY access to 911 over digital wireless service, including its ability to comply with the implementation deadlines established in the *Fourth Report and Order*. Specifically, Cellular 29 has requested, but has not yet received, information from potential infrastructure providers to determine their ability to meet the Commission deadlines.

¹In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Fourth Report and Order*, CC Docket No. 94-102, 15 FCC Rcd 25216, 65 Fed. Reg. 82293 (December 28, 2000), ("*Fourth Report and Order*").

²*Id.*

³Station KNKN649 (CMA412B).

No. of Copies rec'd 014
List A B C D E

In addition to the foregoing, the Commission should be aware that presently Cellular 29 owns only the cell site infrastructure serving its market and obtains switching service from a Motorola switch owned and operated by Alltel. Cellular 29 has requested an update from Alltel as to the status of its software implementation deployment and whether or not it is on schedule to meet the Commission's December 31, 2001 deadline. Cellular 29 understands that Alltel will provide this information directly to the Commission in its quarterly filing. Inasmuch as Cellular 29 is not presently offering digital service over its network, and, even if it were, lacks actual knowledge with respect to the development and deployment activities of Alltel, no response is provided with respect to development activities.

Finally, the primary handset providers to Cellular 29 are Motorola and Nokia. Cellular 29 has recently requested that its handset manufacturers provide information on their progress in achieving full compliance with the Commission's rules from the standpoint of providing TTY-compatible digital handsets in sufficient time to allow for testing and compliance with the applicable in-service deadlines. Cellular 29 has not yet received responses to these queries, and therefore cannot report on these development activities.

II. Access to E911 Through TTY Devices

A. Development Activities

- (1) *Network Infrastructure Software Development*
- (2) *Handset Development and Testing Plans*
- (3) *Beta Testing and Lab Testing*
- (4) *Release and General Availability to Carriers of Network Infrastructure Software*
- (5) *Availability to Carriers of Full Acceptance Test Units*
- (6) *Efforts Toward Achieving Digital Wireless Solution Compatibility With Enhanced TTY Devices*

B. Testing and Deployment Activities

- (7) *Carrier Coordination of Testing With PSAP*
- (8) *Carrier Testing Activities, Including Field Testing, Consumer End-to-end Testing, and Other Necessary Tests*
- (9) *Retail Availability of Necessary Consumer Equipment*
- (10) *Geographic Scope of Network Infrastructure Deployment*

Cellular 29 does not presently offer digital service and therefore has not undertaken any testing and/or deployment on its network as of this date.

Respectfully Submitted,

RSA 1 Limited Partnership d/b/a/
Cellular 29 Plus



April 13, 2001

Michael K. Kurtis
Anna E. Ward

It's Attorneys

Kurtis & Associates, P.C.
2000 M Street N.W.
Suite 600
Washington, D.C. 20036
(202) 328-4500

CERTIFICATE OF SERVICE

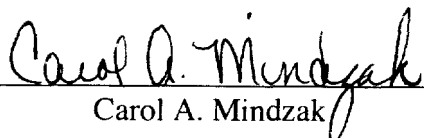
I, Carol A. Mindzak, a secretary with the law firm of Kurtis & Associates, P.C., do hereby certify that I have this 13th day of April 2001, filed the foregoing "REPORT TO THE FEDERAL COMMUNICATIONS COMMISSION ON CARRIER EFFORTS TOWARD ATTAINING DIGITAL TTY ACCESSIBILITY, AND THE STATUS OF THE VARIOUS TECHNOLOGICAL SOLUTIONS, AS PROVIDED BY CC DOCKET NO. 94-102, IN THE MATTER OF REVISION OF THE COMMISSION'S RULES TO ENSURE COMPATIBILITY WITH ENHANCED 911 EMERGENCY CALLING SYSTEMS" electronically with the Federal Communications Commission's Electronic Comment Filing System. I have also filed a diskette copy of this report with the Federal Communications Commission's copy contractor, International Transcription Service. In addition, on this date, I have served copies of this Report via hand delivery or e-mail to the following:

Magalie Roman Salas, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Pam Gregory, Chief
Disabilities Rights Office
Consumer Information Bureau
Federal Communications Commission
445 12th Street, S.W., Rm. 6-C415
Washington, D.C. 20554

Jim Schlichting, Chief
Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C254
Washington, D.C. 20554

Melinda S. Littell*
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-A161
Washington, D.C. 20554
mlittell@fcc.gov


Carol A. Mindzak

* Sent via e-mail